

1 ADAM PAUL LAXALT  
Attorney General  
2 JEFFREY M. CONNER (Bar. No. 11543)  
Assistant Solicitor General  
3 State of Nevada  
Office of the Attorney General  
4 100 North Carson Street  
Carson City, NV 89701-4717  
5 (775) 684-1100 (phone)  
(775) 684-1108 (fax)  
6 jconner@ag.nv.gov  
Attorneys for Respondent  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 CARL BRADLEY,

11 Petitioners,

12 vs.

13 ATTORNEY GENERAL OF THE STATE OF  
14 NEVADA, *et al.*,

15 Respondents.

Case No. 2:13-cv-01196-RFB-GWF

**MOTION FOR ENLARGEMENT OF TIME  
(SECOND REQUEST)**

16 Respondents, by and through counsel, Adam Paul Laxalt, Attorney General of the State of  
17 Nevada, hereby respectfully move this Court for an order granting a five (5) day enlargement of time,  
18 to and including August 1, 2018, in which to file and serve their reply.

19 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure  
20 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and  
21 other materials on file herein.

22 There have been one prior enlargement of Respondents' time to file said reply, and this motion  
23 is made in good faith and not for the purposes of delay.

24 RESPECTFULLY SUBMITTED this 26th day of July, 2018.

25 ADAM PAUL LAXALT  
Attorney General

26 By: /s/ Jeffrey M. Conner  
27 JEFFREY M. CONNER (Bar. No. 11543)  
28 Assistant Solicitor General

1 ADAM PAUL LAXALT  
Attorney General  
2 JEFFREY M. CONNER (Bar. No. 11543)  
Assistant Solicitor General  
3 State of Nevada  
Office of the Attorney General  
4 100 North Carson Street  
Carson City, NV 89701-4717  
5 (775) 684-1100 (phone)  
(775) 684-1108 (fax)  
6 jconner@ag.nv.gov  
Attorneys for Respondent  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 CARL BRADLEY,

11 Petitioners,

12 vs.

13 ATTORNEY GENERAL OF THE STATE OF  
14 NEVADA, *et al.*,

15 Respondents.

Case No. 2:13-cv-01196-RFB-GWF

**DECLARATION OF COUNSEL**

16 I, JEFFREY M. CONNER, declare under penalty of perjury:

17 1. I am an Assistant Solicitor General in the Office of the Attorney General of the State of  
18 Nevada, and I make this declaration on behalf of Respondents' motion for enlargement of time in the  
19 above-captioned matter.

20 2. Respondents reply in support of the motion to dismiss is due July 27, 2018. By this  
21 motion, I am requesting an enlargement of five (5) days, to and including August 1, 2018. This is  
22 Respondents' second request for an enlargement to file the reply.

23 3. While preparing the reply in this matter, I discovered that Bradley had inadvertently  
24 filed the wrong declaration in support of his opposition to the motion to dismiss. After informing  
25 opposing counsel of the discrepancy, Bradley filed a corrected image. ECF No. 85. In addition to the  
26 fact that I have numerous filing deadlines in various state and federal matters over the next few days, I  
27 need additional time to adequately review the declaration and complete the reply. Accordingly,

28 ///

1 Respondents respectfully request that this Court issue an order granting them an enlargement of five (5)  
2 days to, and including, August 1, 2018, to file a reply in support of the motion to dismiss.


3 4. Although opposing counsel, Assistant Federal Defender Amelia Bizzaro, is currently out  
4 of the office, her legal assistant, Jessica Pillsbury, informed me that they do not oppose Respondents'  
5 request for additional time.

6 5. This motion for enlargement of time is made in good faith and not for the purpose of  
7 unduly delaying the ultimate disposition of this case.

8  
9 By: /s/ Jeffrey M. Conner  
JEFFREY M. CONNER (Bar. No. 11543)  
Assistant Solicitor General

10  
11 APPROVED:

12 DATED this 9th day of August, 2018.

13  
14  
15   
16 RICHARD F. BOULWARE, II  
United States District Judge

